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January 30, 2018

By ECF

Honorable Margo Brodie
United States District Court
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Re: *United States v. Munther Saleh*, 15 Cr. 393 (MKB)

Dear Judge Brodie,

Mr. Saleh respectfully submits this letter in response to Fareed Mumuni's application for a sentencing adjournment. Should the Court grant Mr. Mumuni's application, Mr. Saleh respectfully requests that his sentencing hearing be held, as scheduled, on February 6, 2018. It has been more than two and a half years since Mr. Saleh's arrest in June 2015 and nearly a year since his guilty plea in February 2017. The case has taken a serious mental and emotional toll on his family, and an additional adjournment will only increase their anxiety.

The government has not provided a compelling reason for a joint sentencing hearing. Mr. Mumuni has moved for a *Fatico* hearing. Mr. Saleh has not requested a *Fatico* hearing, nor is one necessary in his case. The parties do not dispute the evidence before the Court but only the inferences to be drawn from that evidence. The government notes that one or more victims may testify and argues that a joint hearing will be more efficient and save the witnesses from having to describe a traumatic incident more than once. But the victims are law enforcement agents, not civilian witnesses. Their victim impact statements will be brief, and they are likely to attend both sentencing hearings anyway, whether or not they testify before the Court.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
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cc: AUSA Alex Solomon
AUSA Doug Pravda
AUSA Ian Richardson